BEFORE INDEPENDENT HEARING COMMISSIONERS
AT PORIRUA

I MUA NGĀ KAIKŌMIHANA WHAKAWĀ MOTUHAKE
KI PORIRUA

IN THE MATTER	**of the Resource Management Act 1991**
AND	
IN THE MATTER	**of the hearing of submissions on the Proposed Porirua District Plan and Variation 1**

HEARING TOPIC: **Hearing Stream 7 – Variation 1; Plan Change 19; Residential; and Commercial Zones**

LEGAL SUBMISSIONS ON BEHALF OF KĀINGA ORA – HOMES AND COMMUNITIES

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1. SUMMARY OF POSITION

1.1 Kāinga Ora's submissions on the PDP and Variation 1 seek to promote the vision of growth, the establishment of future urban communities and intensified housing, along with the enablement of infrastructure integration, envisaged in the RMA as amended by the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act (**HSEA**), and NPS-UD which will achieve healthy, vibrant communities.

1.2 The HSEA and NPS-UD require a change of mindset when it comes to determining the appropriate planning framework in urban environments. Where qualifying matters are relied on to reduce the application of policy 3 of the NPS-UD or the MDRS, the evidence and cost-benefit analysis justifying that reliance must be thorough and careful.

1.3 Kāinga Ora wishes to acknowledge the mahi that the Council has done between the initial PDP and Variation 1 processes. Kāinga Ora has valued the engagement it has had from Council officers to understand Kāinga Ora's position. It strongly supports the direction that the Council has taken in Variation 1, and considers that the outcome is one of the best in the country in terms of giving full and appropriate effect to the NPS-UD.

1.4 There really remain only three significant areas in which Kāinga Ora is concerned that the Council's reasoning process for reducing the application of policy 3 or the MDRS does not meet the legislative requirements:

(a) The proposed planning frameworks for Pukerua Bay and Paremata, which are both served by mass rapid transit stops, do not give effect to policy 3 of the NPS-UD. But no attempt to identify or justify a qualifying matter is apparent. The Panel should prefer Kāinga Ora's evidence in relation to the appropriate frameworks in these areas.

(b) The evidence and analysis underpinning the Council's reliance on shading as a qualifying matter in relation to south-

facing, steep slopes is not sufficient to justify the proposed reduction in the MDRS.

(c) Nor is the justification for the imposition of a height control adjacent to heritage items and sites of significance to Māori.

1.5 These submissions also address a point about usability of the plan, which is the role and position of design guides, and issues arising from the planning framework around the RNZ AM frequency transmitter on Whitireia Peninsula which, at the time of writing, the experts are yet to land.

2. KĀINGA ORA – HOMES AND COMMUNITIES

2.1 Kāinga Ora is a major participant in various intensification streamlined planning processes (**ISPP**) across the country designed to give effect to national policy direction on urban development. The extent and tenor of Kāinga Ora's participation in these processes reflects its commitment both to achieving its statutory mandate and to supporting territorial authorities to take a strategic and enabling approach to the provision of housing and the establishment of sustainable, inclusive and thriving communities.

2.2 Kāinga Ora and its predecessor agencies have a long history of building homes and creating sustainable, inclusive and thriving communities and it remains the holder and manager of a significant portfolio of Crown housing assets. More recently, however, the breadth of the Kāinga Ora development mandate has expanded and enhanced with a range of powers and functions under both the Kāinga Ora – Homes and Communities Act 2019 and the Urban Development Act 2020.

2.3 The detailed submissions lodged by Kāinga Ora on the Porirua IPI (Variation 1) are intended to:

(a) Support the Council to give effect to national policy direction, and in particular, the NPS-UD;

(b) Encourage the Council to utilise the important opportunity provided by the IPI to enable much-needed housing development utilising a place-based approach that respects the diverse and unique needs, priorities, and values of local communities;

(c) Test the quality of reasoning and evidence relied on to reduce height, density or development capacity against the legal requirements for qualifying matters; and

(d) Optimise the ability of the proposed district plan (**PDP**) to support both Kāinga Ora and the wider development community to achieve government housing objectives within those communities experiencing growth pressure or historic underinvestment in housing.

2.4 Kāinga Ora also seeks to offer a national perspective to facilitate cross-boundary consistency in the implementation of the Act, which it hopes is of assistance to the Council.

2.5 These legal submissions will:

(a) Briefly summarise the statutory framework within which Kāinga Ora operates;

(b) Describe the step-change that the NPS-UD and HSEA require when establishing the planning framework;

(c) Address specific issues raised by the evidence which have a legal dimension, including:

(i) The unsatisfactory approach taken to the proposed framework for Pukerua Bay and Paremata;

(ii) The Council's reliance on shading as a qualifying matter;

(iii) Proposed height control adjacent to heritage items and sites of significance to Māori;

(iv) Issues arising from the planning framework in the vicinity of Radio New Zealand's AM frequency transmitter on Whitireia Peninsula;

(v) The role of design guides in the planning framework.

2.6 Finally, these submissions remind the Panel of the position in relation to Waka Kotahi's proposed State Highway vibration standard, NOISE-S3A. This was addressed by the parties at length in Hearing Stream 4 but Waka Kotahi has filed additional evidence on that issue through this process (Ms Heppelthwaite).

3. KĀINGA ORA AND ITS STATUTORY MANDATE

3.1 The corporate evidence of Mr Liggett sets out the key statutory provisions from which Kāinga Ora derives its mandate. In short, Kāinga Ora was formed in 2019 as a statutory entity under the Kāinga Ora-Homes and Communities Act 2019, which brought together Housing New Zealand Corporation, HLC (2017) Ltd and parts of the KiwiBuild Unit.

3.2 As the Government's delivery agency for housing and urban development, Kāinga Ora works across the entire housing development spectrum with a focus on contribution to sustainable, inclusive and thriving communities that enable New Zealanders from all backgrounds to have similar opportunities in life.[1] It has two distinct roles: the provision of housing to those who need it, including urban development, and the ongoing management and maintenance of the housing portfolio.

3.3 In relation to urban development, there are specific functions set out in the Kāinga Ora–Homes and Communities Act 2019. These include:

(a) to initiate, facilitate, or undertake any urban development, whether on its own account, in partnership, or on behalf of other persons, including:[2]

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1 Kāinga Ora–Homes and Communities Act 2019, s 12.
2 Kāinga Ora–Homes and Communities Act 2019, s 13(1)(f).

(b) development of housing, including public housing and community housing, affordable housing, homes for first-home buyers, and market housing:[3]

(c) development and renewal of urban developments, whether or not this includes housing development;[4]

(d) development of related commercial, industrial, community, or other amenities, infrastructure, facilities, services or works;[5]

(e) to provide a leadership or co-ordination role in relation to urban development, including by-[6]

(i) supporting innovation, capability, and scale within the wider urban development and construction sectors;[7]

(ii) leading and promoting good urban design and efficient, integrated, mixed-use urban development:[8]

(f) to understand, support, and enable the aspirations of communities in relation to urban development;[9]

(g) to understand, support, and enable the aspirations of Māori in relation to urban development.[10]

3.4 Further, Kāinga Ora considers that the compact urban form promoted by the HSEA and to be implemented through the IPI is clearly aligned with its functions:

(a) A compact urban form enables residents to live closer to places of employment, education, healthcare, and services

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3 Kāinga Ora–Homes and Communities Act 2019, s 13(1)((f)(i).
4 Kāinga Ora–Homes and Communities Act 2019, s 13(1)(f)(ii).
5 Kāinga Ora–Homes and Communities Act 2019, s 13(1)(f)(iii).
6 Kāinga Ora – Homes and Communities Act 2019, s 13(1)(g).
7 Kāinga Ora – Homes and Communities Act 2019, s 13(1)(g)(i).
8 Kāinga Ora – Homes and Communities Act 2019, s 13(1)(g)(ii).
9 Kāinga Ora – Homes and Communities Act 2019, s 13(1)(h).
10 Kāinga Ora – Homes and Communities Act 2019, s 13(1)(i).

such as retail. That reduces the need for travel and supports the use of public transport and active transport modes.

(b) The intensification around centres promoted by Policy 3 of the NPS-UD further supports those outcomes while enabling the centres to increase in scale, economic activity and viability, diversity of economic, social and cultural activities, and vibrancy.

(c) A compact urban form enables the sharing of key infrastructure such as urban roading, three water networks and reduces the marginal cost of construction for such infrastructure.

(d) Intensification, particularly through multi-storey development, reduces the total extent of impermeable surfaces (having regard to roading as well as building coverage) and, consequently, reduces the total stormwater runoff from urban development.

(e) Intensification enables an urban form that, overall, is more efficient, connected and supportive of residents while reducing or avoiding the adverse effects and inefficiencies that can arise from less compact forms of development.

3.5 In recent years, Kāinga Ora has had a particular focus on redeveloping its existing landholdings, using sites more efficiently and effectively so as to improve the quality and quantity of public and affordable housing available for those most in need of it.

3.6 The direction contained in the NPS-UD (coupled with the MDRS required by the HSEA) provides an opportunity to address that issue for the future. Kāinga Ora's submissions have therefore focused on ensuring the planning framework supports critical drivers of successful urban development including density, height, proximity to transport and other infrastructure services and social amenities, as well as those factors that can constrain development in areas that need it,

either now or as growth forecasts may project. It has thought critically about attempts to pull back from intensification in areas with identified qualifying matters and tested the evidence and reasoning used to justify this.

3.7 If planning frameworks are sufficiently well crafted, benefits will flow to the wider development community. With the evolution of the Kāinga Ora mandate, via its 2019 establishing legislation and the UDA in 2020, the government is increasingly looking to Kāinga Ora to build partnerships and collaborate with others in order to deliver on housing and urban development objectives. This will include partnering with private developers, iwi, Māori landowners, and community housing providers to enable and catalyse efficient delivery of outcomes, using new powers to leverage private, public and third sector capital and capacity.

4. NPS-UD AND HSEA – CHANGE OF MINDSET REQUIRED

4.1 The NPS-UD was approved on 20 July 2020. Section 55 of the RMA governs local authority recognition of national policy statements but in this case implementation of the NPS-UD has been accelerated by the subsequent passage of the HSEA.

4.2 Together these documents require those making recommendations and decisions on proposed plans to change their mindset in a fundamental way.

4.3 The NPS-UD and HSEA have their origins in the Productivity Commission's report *Using land for housing*.[11] Among the Report's findings were that planning frameworks were overly restrictive on density, and that density controls were too blunt, having a negative impact on development capacity, affordability, and innovation. The Report also commented that planning rules and provisions lacked adequate underpinning analysis, resulting in unnecessary regulatory

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11 Productivity Commission *Using land for housing* (September 2015).

costs for housing development. This was particularly the case in respect of heritage and "special character" protection.

4.4 Policy 3 of the NPS-UD is directive. It requires district plans to enable building heights and density of urban form:

(a) As much as possible in city centre zones to maximise the benefits of intensification;

(b) In all cases at least six storeys and otherwise reflecting demand in metropolitan centre zones;

(c) At least six storeys within at least a walkable catchment of rapid transit stops, and the edge of city and metropolitan centre zones; and

(d) Commensurate with the level of commercial activity and community services within and adjacent to neighbourhood centre zones, local centre zones, and town centre zones.

4.5 Notably:

(a) Six storeys is a floor, not a ceiling. *At least* six storeys must be enabled in metropolitan centre zones, walkable catchments etc.

(b) In policy 3(c), six storey building heights are to be enabled *at least* within the referenced walkable catchments. In other words, even beyond the walkable catchments territorial authorities should be considering enabling at least six storeys. Despite this, it appears most territorial authorities have limited themselves to strict walkable catchments, thereby potentially failing to give effect to the NPS-UD.

4.6 Perhaps the most significant policy in terms of the approach decision-makers must take is policy 6(b). It provides:

Policy 6: When making planning decisions that affect urban environments, decision-makers have particular regard to the following matters:

…

(b) that the planned urban built form in those RMA planning documents may involve significant changes to an area, and those changes:

(i) may detract from amenity values appreciated by some people but improve amenity values appreciated by other people, communities, and future generations, including by providing increased and varied housing densities and types; and

(ii) are not, of themselves, an adverse effect.

4.7 The requirement to have particular regard to a matter "is an injunction to take the matter into account, recognising it as something important to the particular decision and therefore to be considered and carefully weighed in coming to a conclusion."[12] This policy accordingly gives significant scope for decision-makers to prioritise the amenity values to be appreciated by future generations, and those currently struggling to find housing in the highly constrained housing and rental markets, over existing levels of amenity.

4.8 Section 77G(1) of the HSEA imposes on territorial authorities a duty to incorporate the MDRS in "*every relevant residential zone*", which is defined as meaning all residential zones (with some irrelevant exclusions). Section 77G(2) imposes a duty to give effect to the NPS-UD in "*every residential zone in an urban environment*".

4.9 The sole basis on which a territorial authority may reduce the application of the MDRS or the building heights and density of urban form required by policy 3 is by identifying a matter that qualifies, through evidence and cost-benefit analysis, to reduce the otherwise strict application of the MDRS and policy 3.

4.10 Policy 4 of the NPS-UD and section 77I provide that a district plan may be less enabling than the MDRS and policy 3 require *only to the extent necessary to accommodate* a qualifying matter.

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12 *Marlborough District Council v Southern Ocean Seafoods Ltd* [1995] NZRMA 220 at 228; approved in *New Zealand Transport Agency v Architectural Centre Inc* [2015] NZHC 1991 at [67]-[68].

4.11 The italicised words are significant and important. They mean that when evidence establishes that a less-enabling provision is appropriate, the starting point is the MDRS or policy 3 requirements, and the reduction from that level must be to the least extent necessary to accommodate the matter.

4.12 The Productivity Commission Report findings about weak cost-benefit analysis have led to ss 77I-77L and cls 3.32-3.33 of the NPS-UD which seek to strengthen the level of rigour in evidence and analysis required to establish restrictions on development through qualifying matters.

4.13 In making recommendations on the PDP and Variation 1 the starting point must be the NPS-UD and HSEA. Any changes to the planning framework required by these documents may then be considered, but any such changes may only be imposed to the limited extent justifiable after following the statutory process for considering those changes. And the costs and benefits of any changes must be strictly assessed and quantified. It is not appropriate to determine that a qualifying matter exists and leap to maintenance of the status quo.

5. PUKERUA BAY AND PAREMATA

5.1 The Council's position on giving effect to policy 3 in Pukerua Bay and Paremata, and how it reached that position, is set out in the section 32 evaluation report *Part B: Urban Intensification – MDRS and NPS-UD Policy 3*. The Council has taken a multi-criteria approach resulting in zoning structures for Pukerua Bay and Paremata that does not give effect to Policy 3 of the NPS-UD and, to the extent that the plan provides for reduced heights and densities from those required by policy 3, the Council has not relied on any identified qualifying matter or compliant reasoning process.

5.2 There does not appear to be any dispute that Pukerua Bay and Paremata are served by rapid transit stops on the Kapiti commuter train line. That being the case, policy 3(c) of the NPS-UD *requires*

that these areas be zoned for at least 6 storeys within a walkable catchment of those stops, unless a qualifying matter applies.

5.3 Instead, the Council's approach appears to be that because Pukerua Bay does not currently have a supermarket, and Paremata has no supermarket or convenient local park, it does not consider that zoning these locations as required by policy 3(c) is appropriate.

5.4 The Council, correctly, does not appear to suggest that an absence of a supermarket is a qualifying matter, and undertakes no analysis of the kind that would be required by s 77J and 77L to establish an appropriate evidence base or cost-benefit analysis for the qualifying matter.

5.5 The Council's approach suffers from a failure to adopt the mindset shift referred to above. It puts the cart before the horse in suggesting that a present absence of amenities requires a different approach to the zoning without appreciating that:

(a) With an increase in population the market may provide additional amenities and services; and

(b) Policy 6(b) makes it clear that amenity will change and this is not necessarily a bad thing.

5.6 The Council's section 32 analysis relies on economic evidence suggesting that even with population increase a supermarket is unlikely to establish in Pukerua Bay. That is not necessarily accepted,[13] but it is frankly irrelevant. The reason that the NPS-UD requires the enabling of intensification around rapid transit stops is so that residents have ready access to amenities and services near other stops on the same rapid transit service. Pukerua Bay residents will be able to walk to the station, catch a train to Mana or Paraparaumu, buy their groceries, and return home.

5.7 The evidence of Karen Williams, Nick Rae, and Mike Cullen should be preferred. Increasing density will improve the urban interface with,

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[13] Evidence of Nick Rae at [8.1].

and pedestrian safety in relation to, the State Highway, and improve the quality of the centre's commercial buildings.[14]

5.8 With respect, the Panel must adopt Kāinga Ora's submissions on this issue if its recommendations are to meet the legal requirements of the NPS-UD. Mr Rae has proposed in his evidence some refinements to what would otherwise be a standard 800m walkable catchment to take account of topographical issues.[15] Ms Williams has adopted this position as identifies that zoning the area as an expanded NCZ with application of he "Height Increase A" tool is appropriate.[16] Kāinga Ora relies on Ms Williams' s 32AA analysis in support of these changes.[17]

6. USE OF SHADING AS A QUALIFYING MATTER

6.1 The Council has decided to include site specific height management controls to manage shading effects from sites on steep, south facing slopes, and which will adversely shade the Mungavin Netball court complex.[18] Shading effects are not a listed qualifying matter in s 77I or cl 3.32 of the NPS-UD, so they must be justified as an "other matter" under s 77I(j) in accordance with ss 77J and 77L.

6.2 In my submission a strong case could be made that shading is not a permissible qualifying matter as a matter of statutory interpretation. The argument is that "any other matter" must be interpreted consistently with the role of qualifying matters within the overall purpose of the NPS-UD and HSEA. That purpose includes the development of the MDRS which already provide shading controls and did not provide for flexibility in that control for the slope or compass direction of a site. Accordingly, to rely on a qualifying matter to reduce the application of the MDRS defeats its purpose.

6.3 Nonetheless, Kāinga Ora's opposition to height reductions on account of shading effects is more heavily reliant on Ms Williams' careful

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14 Evidence of Michael Cullen at [10.3]-[10.4].
15 Evidence of Nick Rae at [8.1] and Attachment F.
16 Evidence of Karen Williams at [6.13]-[6.15].
17 Evidence of Karen Williams at Appendix A Table 6.
18 See *Section 32 Evaluation Report Part B: Urban Intensification – MDRS and NPS-UD Policy 3* at [11.2.2.1].

assessment of the limited evidence suggesting any causal link between shading on residential dwellings and human health outcomes.[19] Likewise, Mr McIndoe's reports which underlie the Council's position acknowledge the relative lack of research in this area. To be clear, the Council has not opposed the imposition of a shading height control in relation to the Mungavin Ave Netball facility because it considers it appropriate to protect an important outdoor community facility.

6.4 Under s 77J, to justify reliance on a qualifying matter the evaluation report must demonstrate why the territorial authority considers that the qualifying matter is incompatible with the level of development permitted by the MDRS, assess the impact of limiting building height on the provision of development capacity, and assess the costs and broader impacts of imposing those limits. Under s 77L the territorial authority must go further and justify why that characteristic makes that level of development inappropriate in light of the national significance of urban development and the objectives of the NPS-UD.

6.5 Part [11.2.2.1] of the relevant s 32 report is where the Council seeks to meet the requirements of ss 77J and 77L. There are two main difficulties with that part of the report:

(a) It contains no assessment the costs and broader impacts of imposing a reduced height limit. No quantification of those costs is attempted.

(b) It purports to meet s 77L(b) by determining that "there is no tension between controls intended to enable people to provide for their health and social wellbeing and the requirement to recognise the national significance of urban development", but this reasoning is inconsistent with the premise of s 77L(b). The premise of s 77B is that any reduction limits urban development. The point of s 77L(b) is to require territorial authorities to identify and appreciate the

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19 Evidence of Karen Williams at [7.5]-[7.8].

national significance of urban development (and the NPS-UD's thrust of maximising enablement of development potential) and balance that against the specific justification as to why the particular characteristic makes that level of development inappropriate. Contrary to the sentence just cited, there is plainly a significant tension between controls intended to enable people to provide for their health and social wellbeing and the requirement to recognise the nationally significant need for increased urban development.

6.6 For the reasons explained by Ms Williams, the notion that shading that would be created by imposition of the MDRS on these south-facing sloped sites would create such risk to health outcomes (over and above that created by the MDRS on other sites) as to justify imposing lower limits does not make sense in light of the weak evidence suggesting that there are any health effects at all. When compared to the national significance of urban development, the reduction in building height is not justifiable.

7. HEIGHT CONTROL ADJACENT TO HERITAGE ITEMS AND SITES OF SIGNIFICANCE TO MĀORI

7.1 Fundamentally similar arguments apply to the Council's position of imposing a height control adjacent to heritage items and sites of significance to Māori.

7.2 The assessment required by ss 77J is undertaken at [11.2.2.2] of the s 32 report.[20] That part purports to assess the costs and broader impacts of the reduction as follows:

> As identified in the Property Economics report there will be costs associated with the controls, however, in terms of housing supply they are negligible. There will also be a direct cost to landowners affected by the additional restrictions, however the controls are no greater than those imposed by the PDP.

7.3 Again there is no attempt at all to quantify the costs on landowners as a result of the decision to impose a more restrictive height control.

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20 *Section 32 Evaluation Report Part B: Urban Intensification – MDRS and NPS-UD Policy 3.*

Reduced housing supply is asserted to be a negligible cost given the evidence about housing supply enabled by the plan as a whole, but there is no discussion of the specific opportunity cost on these sites.

7.4 Just as significantly, the unquantified cost is sought to be justified not by considering its impact when compared to the national significance of urban development, but instead by asserting that the controls are no greater than those imposed by the PDP.

7.5 The controls that the PDP sought to impose are irrelevant to the issue for two reasons. First, they predated the NPS-UD. Second, this form of reasoning demonstrates a failure to adopt the mindset shift required by that document and discussed earlier in these submissions. It leaps to maintenance of the status quo.

8. RADIO NEW ZEALAND FREQUENCY TRANSMITTER

8.1 At the time of writing the two technical experts, Mr Gledhill and Mr White are in the course of drafting a joint witness statement. What is apparent is that the provisions in Variation 1 restricting application of the MDRS in the vicinity of the RNZ AM transmitter may not be necessary and are not the least restriction available when compared to the national significance of urban development.

8.2 Based on the evidence lodged (but subject to the joint witness statement to be produced), the issues arising from the mast appear to be focused more on construction methodologies and health and safety during construction rather than the control of urban form. To the extent that these concerns are not addressed in other legislation, it may be that the focus of new provisions should be on controlling the use of cranes, cherry pickers and the like, rather than limiting the MDRS building height standard.

8.3 Counsel and planning witnesses may need to address the Panel orally at the hearing further on these issues.

9. DESIGN GUIDES

9.1 The appropriate role of design guides in the planning framework is discussed in some detail in the planning evidence of Ms Williams.[21] I do not see this question as a legal matter but instead as a matter of planning preference. That said, there is some overlap with the competing positions taken by the Council and Kāinga Ora in relation to the appropriate role of flood hazard mapping which was addressed in Hearing Stream 3.

9.2 Kāinga Ora's position that design guides are best used as non-statutory guidance supporting design outcomes that are clearly stated within, as Ms Williams puts it, "the engine room" of the plan is, as a matter of planning practice, consistent with its position on flood hazard mapping.

9.3 Ms Williams raises an issue about consistency between the proposed plan and Policy 54 of the RPS. The plan must give effect to the RPS. Kāinga Ora does not go so far as to say that the Council's position does not give effect to the RPS, but Ms Williams' evidence suggests that Kāinga Ora's position, preferring clearly stated design outcomes with non-statutory guidance, gives *better* effect to the RPS.

10. WAKA KOTAHI VIBRATION STANDARD

10.1 Kāinga Ora notes the evidence lodged by Waka Kotahi (Ms Heppelthwaite) in support of its proposed vibration standard, NOISE-S3A. This matter was addressed at length through the evidence filed in Hearing Stream 4, including from Mr Liggett (corporate) and Mr Styles (noise and vibration).

10.2 To avoid repetition, the Panel is reminded of the evidence from Mr Styles on why the proposed vibration standard was inappropriate in particular in his statement of evidence at [13.5]-[13.26][22] and joint witness statement of noise experts at paras [24]-[25].[23]

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21 Evidence of Karen Williams, [5.1]-[5.19].

22 Submitter Evidence - Jon Styles (noise and vibration) for Kāinga Ora [81].pdf (storage.googleapis.com).

23 Joint Witness Statement (storage.googleapis.com).

10.3 The Council's expert and s 42A report author were likewise opposed to this proposed standard.

11. EVIDENCE

11.1 Evidence by the following witnesses has been filed in support of Kāinga Ora's position:

(a) Brendon Liggett – Corporate evidence and Kāinga Ora representative;

(b) Karen Williams – planning;

(c) Nick Rae – urban design;

(d) Michael Cullen – urban economics;

(e) Martin Gledhill – electromagnetic field safety.

Date: 9 March 2023

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Nick Whittington